Jack Shaw (SDNY Bar No. JS0104) E-mail: jack.shaw@procopio.com PROCOPIO, CORY, HARGREAVES & SAVITCH LLP

1117 S. California, Suite 200 Palo Alto, California 94304 Telephone: (650) 645-9000 Facsimile: (650) 687-8300

Eric A. Plourde (SDNY Bar No. EP9546) E-mail: eric.plourde@procopio.com PROCOPIO, CORY, HARGREAVES & SAVITCH LLP 525 B Street, Suite 2200 San Diego, CA 92101

Telephone: 619.238.1900 Facsimile: 619.235.0398

Attorneys for Defendant Crazy Maple Studio, Inc.

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited liability company, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New York limited liability company, UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company, CRAZY MAPLE STUDIO, INC, a California corporation,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/18/2022

Case No. 1:22-cv-02435-AT

STIPULATION AND ORDER

WHEREAS, Defendant Crazy Maple Studio, Inc. ("Crazy Maple") was added to this action as a Defendant in the First Amended Complaint ("FAC");

WHEREAS, Crazy Maple accepted service of the First Amended Complaint by signing a Waiver of Service of Summons ("Waiver");

WHEREAS, pursuant to the Waiver Crazy Maple originally had until and including August 1, 2022, to respond to the FAC;

WHEREAS, Crazy Maple has advised Plaintiff that it intends to file a motion to dismiss on grounds of personal jurisdiction and/or to transfer venue;

WHEREAS, Plaintiff and Crazy Maple are discussing the possibility of dismissing the Crazy Maple without prejudice as a party to the action;

WHEREAS, Plaintiff has agreed to extend Crazy Maple's time to respond to the FAC to allow the parties time to hopefully finalize the agreement;

WHEREAS, the Court entered a prior order (ECF No. 52) continuing Defendant Crazy Maple Studio, Inc.'s ("Crazy Maple") time to answer or move with regard to Plaintiff Lynne Freeman's ("Plaintiff") First Amended Complaint (ECF No. 24) until August 22, 2022;

WHEREAS, several unforeseen issues have come up during the negotiation of the dismissal between the parties, including, but not limited to, plaintiff's counsel having been sick the last few days and Crazy Maple's counsel is currently on trial, and the parties require additional time to finalize their agreement;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiff and Crazy Maple that Crazy Maple's time to answer or move with regard to Plaintiff's First Amended Complaint (ECF No. 24) is hereby extended to September 7, 2022.

## CSReeder, PC

By: /s/Mark Passin

Mark Passin (admitted *pro hac vice*) 11766 Wilshire Blvd., Suite 1470 Los Angeles, CA 90025

Tel.: (310) 861-2470 mark@csrlawyers.com

Paul LiCalsi

Reitler Kailas & Rosenblatt LLP

885 Third Avenue, 20th Floor New York, New York 10022

Tel.: 212-209-3050 plicalsi@reiterlaw.com

Attorneys for Plaintiff Lynne Freeman

## Procopio, Cory, Hargreaves & Savitch LLP

By: \_/s/Eric Plourde

Jack Shaw

1117 S. California, Suite 200 Palo Alto, California 94394

Tel.: (650) 645-9019 Jack.shaw@procopio.com

Eric Plourde

525 B Street, Suite 220 San Diego, CA 92101 Tel.: (619) 906-5641

Eric.plourde@procopio.com

Attorneys for Defendant Crazy Maple Studio,

Inc.

SO ORDERED.

Dated: August 18, 2022

New York, New York

ANALISA TORRES United States District Judge